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13 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 SILVANO GONZALEZ-CASTRO,

18 Defendant.

19 Case No.: 2:19-cr-00130-APG-NJK

20 **Joint Stipulation to Continue**
Government's Response to Defendant's
Motion to Dismiss (ECF No. 20), and
Defendant's Reply

21 **(Fourth Request)**

22 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
23 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
24 Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public
Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Silvano
Gonzalez-Castro, that the government's response to defendant's motion to dismiss (ECF
No. 20) currently due on Friday, August 9, 2019, be vacated and continued to August 21,
2019, with defendant's corresponding reply due on August 28, 2019.

25 This Stipulation is entered into for the following reasons:

26 1. Government counsel continues to need additional time to properly respond

27 to defendant's motion, to include researching the issues raised by the defendant.

1 2. On August 6, 2019, government counsel received a copy of an audio
2 recording from the defendant's Immigration Court proceeding. However, the recording
3 is on an audio cassette tape, and the government has experienced delay in converting the
4 recording to a format which it can review and provide to defense counsel. Government
5 counsel has not yet been able to review this recording, which may be dispositive of the
6 current motion.

7 3. Denial of this request for continuance could result in a miscarriage of
8 justice.

9 4. This is the fourth request for continuance of the government response to
10 defendant's motion to dismiss.

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12 DATED this 9th day of August, 2019.

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14 RENE L. VALLADARES
Federal Public Defender

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16 NICHOLAS A. TRUTANICH
United States Attorney

17 By /s/ Monique Kirtley
MONIQUE KIRTELEY
Assistant Federal Public Defender

18 By /s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

SILVANO GONZALEZ-CASTRO,

Defendant.

Case No.:2:19-cr-000130-APG-NJK

ORDER

IT IS THEREFORE ORDERED that the government's response to defendant's motion to dismiss (ECF No. 20) currently due on Friday, August 9, 2019, be vacated and continued to August 21, 2019, with defendant's corresponding reply due on August 28,

DATED this 9th day of August, 2019.

UNITED STATES MAGISTRATE JUDGE